

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JAN 13 1999

In the matter of)
)
Amendment of the FM Table of)
Allotments to Add Channels 221A)
and 283A at Blackduck, Minnesota)

File No. RM-

MM Docket No. _____

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: John A. Karousos, Chief
Allocations Branch, Policy and Rules Division

PETITION FOR RULEMAKING

1. Community Religious Broadcasters ("CRB"), by and through its attorney, hereby requests that the Commission initiate a rulemaking proceeding in order to amend the FM Table of Allotments to add Channels 221A and 283A at Blackduck, Minnesota, as follows:

<u>Community</u>	<u>Current Channel Allotment</u>	<u>Proposed Channel Allotments</u>
Blackduck, Minnesota	252C2	252C2, 221A, 283A

Attached is an Engineering Report in support of this Petition.

2. Blackduck, Minnesota, has a population of approximately 720 and is located in north central Minnesota. Currently, only one other FM station (operating on Channel 252C2) serves the community of Blackduck. The proposed allotments would meet all spacing requirements, as specified in Section 73.207 of the Commission's Rules, and the proposed 3.16 mV/m contours of both would cover the entire community of Blackduck.

3. CRB submits that it would be in the public interest to add Channels 221A and 283A at Blackduck, thereby providing a second and third local FM service there. Provision of such

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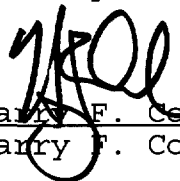
competitive local service is recognized as a "priority two" factor, second only to first local service, in evaluation of proposed channel allotments. See Revision of FM Assignment Policies and Procedures, 90 F.C.C.2d 88 (1982).

4. If the Commission allots Channels 221A and 283A at Blackduck, Minnesota, CRB will apply for a construction permit for that channel and, if that application is granted, CRB will construct and operate the proposed station.

WHEREFORE, for the reasons stated, CRB requests that the FM Table of Allotments be amended as follows:

<u>Community</u>	<u>Current Channel Allotment</u>	<u>Proposed Channel Allotments</u>
Blackduck, Minnesota	252C2	252C2, 221A, 283A

Respectfully submitted,


/s/ Harry F. Cole
Harry F. Cole

Bechtel & Cole, Chartered
1901 L Street, N.W. - Suite 250
Washington, D.C. 20036
(202) 833-4190

Counsel for Community Religious
Broadcasters

January 13, 1999



OWL ENGINEERING, INC.

**CONSULTING COMMUNICATIONS ENGINEERS
EMC TEST LABORATORIES**

**8899 Hastings St. NE, Minneapolis, MN 55449
(612) 785-4115 • Fax (612) 785-4631
1-800-797-1338**

**ENGINEERING STATEMENT ON BEHALF OF
COMMUNITY RELIGIOUS BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 283 BLACKDUCK, MINNESOTA**

November 11, 1998

**ENGINEERING STATEMENT ON BEHALF OF
COMMUNITY RELIGIOUS BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
BLACKDUCK, MINNESOTA**

Owl Engineering, Inc. has been retained by Community Religious Broadcasters to prepare this engineering statement in support of a Petition to Amend the FM Table of allotments, FCC Rule Section 73.202(b) as follows:

<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Blackduck, Minnesota	252 C2	283 A

The reference coordinates for Blackduck used in this study are:

**47° 40' 26" North Latitude
94° 29' 0" West Longitude**

These coordinates are based on the reference coordinates for the transmitter location needed to provide coverage to the community of Blackduck, Minnesota. No site restriction is required. The community of Blackduck has a population of 653 persons based on 1990 US Census data.

An engineering study was performed to determine compliance with FCC Rule Section 73.207 regarding the Commission's minimum mileage spacing requirements. Included as Engineering Exhibit E-1 is a channel allocation study based on the reference coordinates listed above. As can be seen from this exhibit, Community Religious Broadcasters's proposal is in complete conformance with FCC Rule Section 73.207. There is an area to

**ENGINEERING STATEMENT ON BEHALF OF
COMMUNITY RELIGIOUS BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
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BLACKDUCK, MINNESOTA**

locate a transmitter site that will satisfy these minimum mileage spacing requirements and FAA obstruction concerns.

Inspection of Engineering Exhibit E-1 also reveals that the nearest possible conflict is with the allocation at Rainy River, ON. The required mileage separation to the Rainy River allocation clears the community of Blackduck, Minnesota by 0.1 kilometers.

Further analysis was performed to determine compliance with FCC Rule Section 73.315 regarding City Grade (70-dBu) service to the community of Blackduck. The effective antenna height for each of the eight standard 45-degree spaced radials, along with the radial through the principal community was used in conjunction with the F(50,50) metric curves of Figure 1 of Section 73.333 of the Rules was used to determine the distances to the 70 dBu coverage contour, as required by the Rules. This analysis shows that all of Blackduck will receive a signal in excess of 70 dBu, there meeting the coverage requirements of the Rules. Figure 2 shows the predicted 70-dbu-signal coverage contour.

An engineering study was performed to determine the number of persons predicted to be served by a Class A facility located at the reference coordinates. The 60-dBu contour was calculated for a maximized Class A facility and it was determined that a total of 6,653 persons are encompassed in the 60-dBu-signal coverage area.

**ENGINEERING STATEMENT ON BEHALF OF
COMMUNITY RELIGIOUS BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
BLACKDUCK, MINNESOTA**

Based on the engineering studies provided, the following conclusions can be obtained:

1. The proposal will provide Blackduck, Minnesota with a local full time broadcast service.
2. The proposal meets the requirements of FCC Rule Section 73.315.
3. The proposal meets the requirements of FCC Rule Section 73.207.
4. Based on 1990 US Census data 6,653 persons will be served by a signal of 60 dBu or greater with a transmitter located at the reference coordinates.

**ENGINEERING STATEMENT ON BEHALF OF
COMMUNITY RELIGIOUS BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
BLACKDUCK, MINNESOTA**

AFFIDAVIT

RAMSEY COUNTY)
)
STATE OF MINNESOTA) ss:

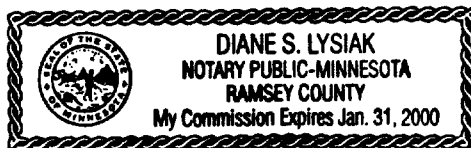
Garrett G. Lysiak, being first duly sworn, says that he is an employee of Owl Engineering, Inc., consulting communications engineers with offices in Blaine, Minnesota: that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission: that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



Garrett G. Lysiak

Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date November 11, 1998.



Diane S. Lysiak
Diane S. Lysiak
Notary Public

My commission expires January 31, 2000

**ENGINEERING STATEMENT ON BEHALF OF
Community Religious Broadcasters
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
Blackduck, Minnesota**

ENGINEERING EXHIBIT E-1

CHANNEL ALLOCATION STUDY

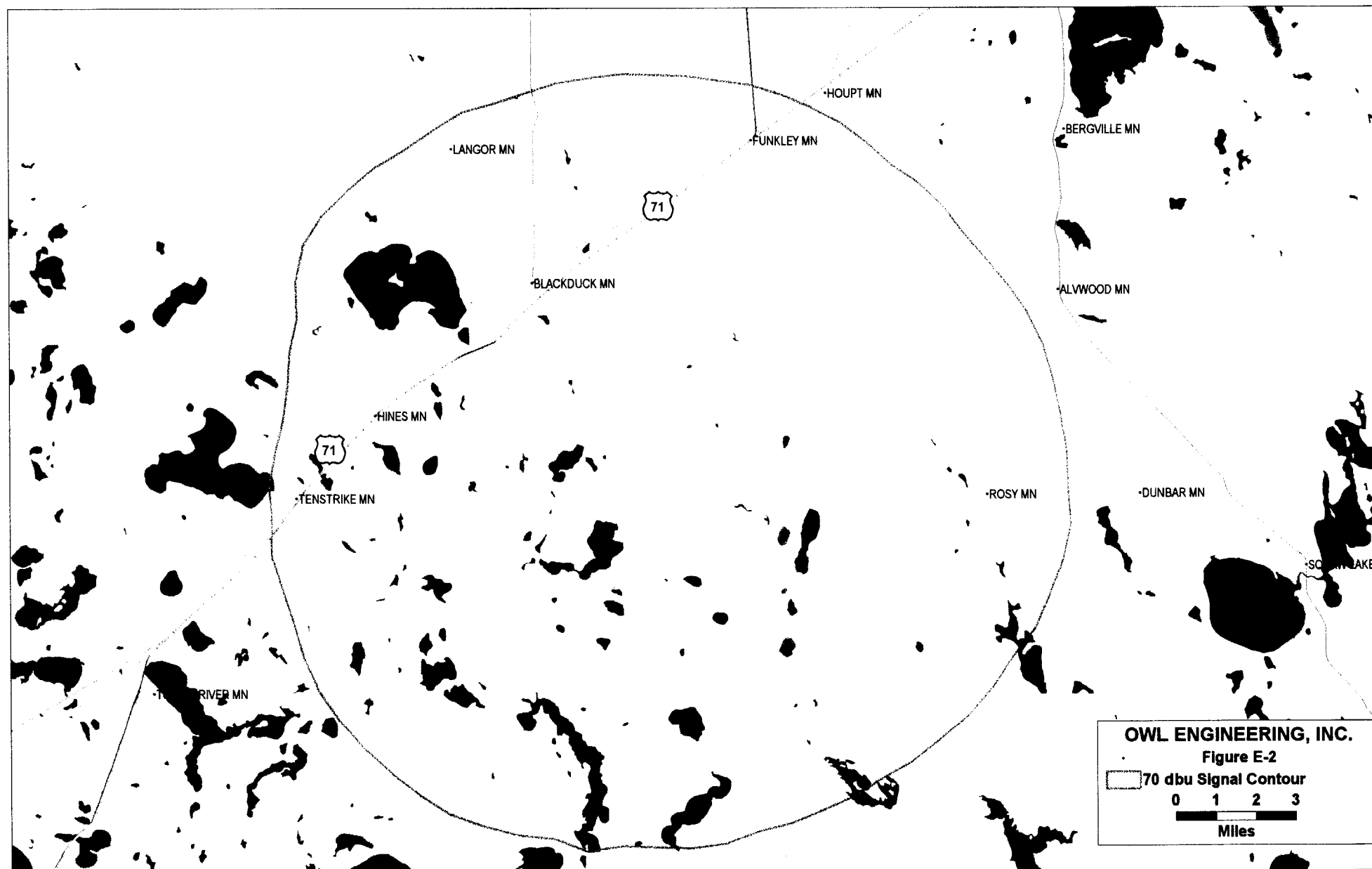
***** FM CHANNEL SPACING STUDY *****

Proposed latitude: N 47 40 26.00
Proposed longitude: W 94 29 0.00
Database file name: C:\FCCData\Fm981108
Use pre-1989 Class A spacings?: N

Proposed channel: 283A

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
282C2	KZIO	13602	Two Harbors	MN	LIC	112.5	205.9	106.0	
230C1	WTBX	14818	Hibbing	MN	LIC	106.4	115.7	22.0	
281C3	KSDM	14839	International Fal	MN	LIC	38.3	130.9	42.0	
284C	KCLDFM	15363	St. Cloud	MN	LIC	180.5	234.2	165.0	
282C2	KLKS	15397	Breezy Point	MN	LIC	171.5	120.3	106.0	
285C		15426	Rainy River	ON	LIC	357.0	116.1	116.0	0.1
282C1	KZLTFM	16509	East Grand Forks	MN	LIC	275.6	184.1	133.0	

***** End of channel 283 study *****





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**ENGINEERING STATEMENT ON BEHALF OF
COMMUNITY RELIGIOUS BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 221 BLACKDUCK, MINNESOTA**

November 11, 1998

**ENGINEERING STATEMENT ON BEHALF OF
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IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
BLACKDUCK, MINNESOTA**

Owl Engineering, Inc. has been retained by Community Religious Broadcasters to prepare this engineering statement in support of a Petition to Amend the FM Table of allotments, FCC Rule Section 73.202(b) as follows:

<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Blackduck, Minnesota	252 C2	221 A

The reference coordinates for Blackduck used in this study are:

**47° 42' 3" North Latitude
94° 29' 15" West Longitude**

These coordinates are based on the reference coordinates for the transmitter location needed to provide coverage to the community of Blackduck, Minnesota. No site restriction is required. The community of Blackduck has a population of 653 persons based on 1990 US Census data.

An engineering study was performed to determine compliance with FCC Rule Section 73.207 regarding the Commission's minimum mileage spacing requirements. Included as Engineering Exhibit E-1 is a channel allocation study based on the reference coordinates listed above. As can be seen from this exhibit, Community Religious Broadcasters's proposal is in complete conformance with FCC Rule Section 73.207. There is an area to

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THE FM TABLE OF ALLOTMENTS
BLACKDUCK, MINNESOTA**

locate a transmitter site that will satisfy these minimum mileage spacing requirements and FAA obstruction concerns.

Inspection of Engineering Exhibit E-1 also reveals that the nearest possible conflict is with CITI-FM in Winnipeg, MB. The required mileage separation to CITI-FM clears the community of Blackduck, Minnesota by 9.6 kilometers.

Further analysis was performed to determine compliance with FCC Rule Section 73.315 regarding City Grade (70-dBu) service to the community of Blackduck. The effective antenna height for each of the eight standard 45-degree spaced radials, along with the radial through the principal community was used in conjunction with the F(50,50) metric curves of Figure 1 of Section 73.333 of the Rules was used to determine the distances to the 70 dBu coverage contour, as required by the Rules. This analysis shows that all of Blackduck will receive a signal in excess of 70 dBu, there meeting the coverage requirements of the Rules.

An engineering study was performed to determine the number of persons predicted to be served by a Class A facility located at the reference coordinates. The 60-dBu contour was calculated for a maximized Class A facility and it was determined that a total of 7,409 persons are encompassed in the 60-dBu-signal coverage area.

**ENGINEERING STATEMENT ON BEHALF OF
COMMUNITY RELIGIOUS BROADCASTERS
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
BLACKDUCK, MINNESOTA**

Based on the engineering studies provided, the following conclusions can be obtained:

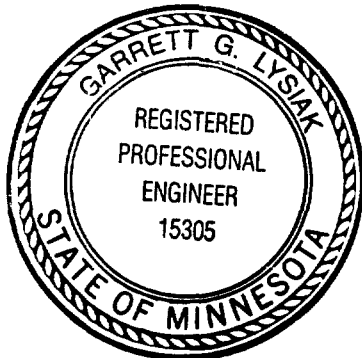
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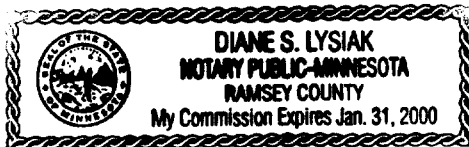
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A handwritten signature in cursive script that reads "Garrett G. Lysiak".

Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date November 11, 1998.



A handwritten signature in cursive script that reads "Diane S. Lysiak".

Diane S. Lysiak
Notary Public

My commission expires January 31, 2000

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Community Religious Broadcasters
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THE FM TABLE OF ALLOTMENTS
Blackduck, Minnesota**

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***** FM CHANNEL SPACING STUDY *****

Proposed latitude: N 47 42 3.00
Proposed longitude: W 94 52 40.00
Database file name: C:\FCCData\Fm981108
Use pre-1989 Class A spacings?: N

Proposed channel: 221A

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
221C3	WWAX	14216	Hermantown	MN	CP	115.0	232.0	142.0	
219C1	KAXE	14816	Grand Rapids	MN	LIC	114.0	119.6	75.0	
220A	NEW	14833	International Fal	MN	APP	47.3	144.3	72.0	
221A	WYRQFM	15339	Little Falls	MN	LIC	167.0	199.7	115.0	
223C3	KXKK	15901	Park Rapids	MN	CP MOD	186.5	86.4	42.0	
223C1	KKWQ	15926	Warroad	MN	LIC	343.4	130.9	75.0	
218C1	KQMN	16499	Thief River Falls	MN	LIC	284.0	133.2	75.0	
220C	KDSU	17163	Fargo	ND	LIC	247.2	190.9	165.0	
221C	CITIFM	17199	Winnipeg	MB	LIC	322.0	268.6	259.0	9.6

***** End of channel 221 study *****

